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**AVAILABLE FOR PUBLIC INSPECTION**

October 1, 2012

**VIA ELECTRONIC FILING**

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

Re: WC Docket No. 11-42 - Lifeline and Link Up Reform and Modernization

**NOTICE OF EX PARTE PRESENTATION**

Dear Ms. Dortch:

This ex parte letter is submitted on behalf of TracFone Wireless, Inc. ("TracFone") in response to a request for information from Commission Staff. On September 13, 2012, Jose Fuentes, Director, Government Relations, Jorge Chomizo of Florida Partners, and I, on behalf of TracFone Wireless, Inc. ("TracFone"), met with Kimberly Scardino, Deputy Chief, Telecommunications Access Policy Division, Wireline Competition Bureau, and with Jonathan Lechter, Attorney-Advisor, Telecommunications Access Policy Division, Wireline Competition Bureau. As noted in a previous notice of ex parte presentation, filed September 17, 2012, during the September 13 meeting, we discussed with Ms. Scardino and Mr. Lechter TracFone's efforts to work with state governmental departments to obtain access to state data bases containing Lifeline enrollment program-based eligibility data. By this letter, TracFone provides information regarding the status of TracFone's ongoing efforts to obtain access to data bases in certain states. This information is contained in a spreadsheet attached to this letter ("Attachment").

**REQUEST FOR CONFIDENTIAL TREATMENT**

Pursuant to Section 0.459 of the Commission's rules, TracFone, by its undersigned counsel, requests that the Attachment to this letter be accorded confidential treatment and that the Attachment not be routinely available for public inspection. In particular, TracFone requests that the Commission accord confidential treatment to information regarding TracFone's ongoing efforts to obtain access to various state databases containing Lifeline enrollment program-based eligibility data. The requested information includes highly confidential competitively sensitive information which would cause TracFone harm if that data became available to existing or potential competitors.

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The Attachment is an internal document that describes TracFone's ongoing efforts to access state data bases, including the identity of the relevant state agencies and staff members of those agencies and a description of the status of TracFone's efforts in several states. This document is not available to any third party. The Attachment discloses TracFone's strategy regarding how it will obtain access to state databases to verify the initial eligibility of Lifeline applicants and the continued eligibility of current Lifeline customers to receive Lifeline benefits. Moreover, the information contained in the Attachment discloses TracFone's internal plan for complying with its Lifeline eligibility verification obligations. TracFone has spent several months contacting numerous state agencies, determining the staff members who can best assist with access to state data bases, and meeting with those staff members. Allowing other Lifeline providers to have access to this information would unfairly provide those providers with a blueprint of how TracFone is complying with its legal obligation to verify Lifeline program-based eligibility. Those providers would unfairly benefit from the months of research and efforts conducted by TracFone. Accordingly, pursuant to Section 0.459 of the Commission's rules, TracFone respectfully requests that the information provided in this letter not be routinely available for public inspection.

TracFone is providing the confidential version of this letter to the members of the Commission staff who requested the information provided in the Attachment. A redacted version of this letter is being filed electronically in accordance with Sections 0.459(a)(1) and 1.1206 of the Commission's rules. If there are questions, please communicate directly with undersigned counsel for TracFone.

Respectfully submitted,



Mitchell F. Brecher

Attachment (omitted from public version)

cc: Mr. Jonathan Lechter  
Ms. Kimberly Scardino